

**REMARKS**

Reconsideration and allowance of the subject application are respectfully requested.

Claims 1-16 are all the claims pending in the application, as claims 9-16 are hereby added.

Applicant respectfully submits the pending claims define patentable subject matter.

***Claim Rejections - 35 USC § 102***

Claims 1-8 are rejected under 35 U.S.C. 102(e) as being anticipated by Davidson et al. (US 6,952,485; hereinafter "Davidson"). Applicant submits the rejection is improper for the following reasons.

Independent claim 1 recites, in part:

a plurality of printers each having information identifying the printer;

a host section that transmits print data to the plurality of printers to instruct the printers to carry out printing;

a discharge portion to which prints from each printer are discharged; and

a printer particular information providing device with which during printing, the printer provides, on each print to be discharged from the discharge portion, particular information indicating which printer has produced the print.

Davidson, by contrast, merely discloses a watermark encoding and decoding system and method applied to different imaging devices such as scanners, printers and imaging device interfaces.<sup>1</sup> Davidson discloses the watermark encoding and decoding can be used in several general applications including counterfeit deterrence, rendering metadata, embedding user data

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<sup>1</sup> See Davidson, Abstract.

and encoding/decoding for scanner and printer pipelining.<sup>2</sup> However, Davidson does not disclose a printer particular information providing device with which during printing, the printer provides, on each print to be discharged from the discharge portion, particular information indicating which printer has produced the print, as the claimed invention requires.

Nevertheless, the Examiner contends Davidson discloses all of the above-noted claimed features. In particular regarding the claimed plurality of printers each having information identifying the printer, the Examiner cites col. 2, lines 11-20 of Davidson in support of his position. Applicant respectfully disagrees with the Examiner's position.

Instead, Applicant points out the cited portion simply discusses counterfeit deterrence and associating the printed image with metadata, and rendering such metadata during the printing process. Regarding the rendering of the metadata, Davidson states:

Rendering the metadata may include displaying information and/or executing some program or hardware function associated with the image being printed, such as fetching and rendering a related web page referenced via the watermark message.<sup>3</sup>

In other words, Davidson only discloses the rendering of the metadata can include displaying information and/or executing some program or hardware function associated with the image being printed. Displaying information and/or executing some program or hardware function associated with the image being printed does not equate to providing information identifying a printer.

Thus, Applicant submits Davidson cannot be construed as providing information identifying a printer. Indeed, Davidson says nothing whatsoever regarding a plurality of printers

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<sup>2</sup> See Davidson, col. 2, lines 4-68.

<sup>3</sup> See Davidson, col. 2, lines 16-20.

having information identifying the printer, such as claim 1 requires. Applicant submits Davidson is silent on such a feature.

Further, regarding the claimed feature “a printer particular information providing device with which during printing, the printer provides, on each print to be discharged from the discharge portion, particular information indicating which printer has produced the print,” the Examiner argues Davidson also teaches this feature, and cites col. 2, lines 4-30. Again, Applicant respectfully disagrees.

Nothing in the cited portion of Davidson even remotely suggests providing, on each print to be discharged, particular information indicating which printer has produced the print. On the contrary, as noted above, Davidson merely discloses several applications (e.g., including counterfeit deterrence, rendering metadata, embedding user data and encoding/decoding for scanner and printer pipelining) none of which relate to providing on each print to be discharged, information indicating which printer has produced the print. Again, Applicant submits the applied art is silent on such a unique feature.

Further, as claim 14 describes, the particular information indicating which printer produced the print comprises a mark, which indicates which printer produced the print. Davidson, on the other hand, fails to contemplate any type of identifier which is associated with or otherwise indicates which printer produces a print. Instead, as noted above, Davidson merely discloses providing a watermark associated with metadata or user information.<sup>4</sup>

Accordingly, Applicant submits independent claim 1 is patentable for at least these reasons. Similarly, Applicant submits independent claim 8, and new independent claim 9 are

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<sup>4</sup> See Davidson, col. 2, lines 13-15 and 30-32.

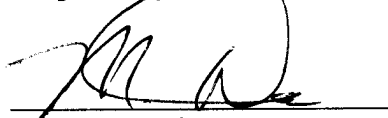
patentable over the prior art of record for reasons analogous to those stated above regarding independent claim 1. Further, Applicant submits dependent claims 2-7 and 10-16 are patentable, at least by virtue of their respective dependency on independent claims 1 and 10.

***Conclusion***

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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